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April 14, 2022

Via ECF

The Honorable Loretta A. Preska,
United States District for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: *Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A.*, No. 15 Civ. 2739 (LAP) (“*Petersen*”); *Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A.*, No. 16 Civ. 8569 (LAP) (“*Eton Park*”)

Dear Judge Preska:

Pursuant to Local Rule 5.2, Rule 2(H) of the Individual Practices of this Court, and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in this action (*Petersen* ECF No. 177; *Eton Park* ECF No. 124) (the “Protective Order”), Defendant the Argentine Republic (“the Republic”) respectfully moves for an order granting leave to file under seal Defendants’ enclosed Memorandum of Law in Support of its Motion for Summary Judgment (the “Memorandum”), Local Rule 56.1 Statement of Material Facts as to Which There is No Genuine Dispute in Support of its Motion for Summary Judgment (the “56.1 Statement”), and Exhibits 2, 3, 34, 35, 45, and 78 to the Declaration of Robert J. Giuffra (the “Exhibits”).

The Exhibits are excerpted portions of deposition transcripts which Plaintiffs have designated Confidential under the Protective Order, as well as documents produced by third parties and designated Confidential under the Protective Order. The Republic seeks leave to file the Exhibits under seal and to redact portions of the publicly-available Memorandum and 56.1 Statement that quote from or describe the produced documents and deposition transcripts in light of Plaintiffs’ and third parties’ designations.

Respectfully,

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.

cc: Counsel of Record